

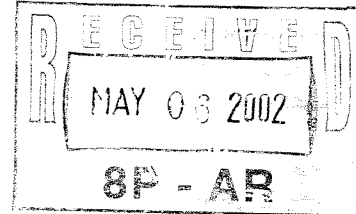


Great Northern Power Development L.P.

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April 26, 2002

Richard R. Long, Director
EPA Region 8
Mailcode 8P-AR
18th Street, Suite 300
Denver, CO 80202



Dear Mr. Long:

As one of the Lignite Vision 21 Program participants, Great Northern Power Development, L.P., is currently investigating the feasibility of building a 500 MW class power plant in western North Dakota. The Lignite Vision 21 Program is a partnership between industry and the State of North Dakota to explore the possibilities of applying state of the art generation and environmental pollution control technologies in the development of clean, low cost electricity.

We appreciate the opportunity for input regarding EPA's current air modeling analysis of the North Dakota PSD increment released on March 5, 2002, and offer the following comments for your consideration:

1. It is our understanding that the State has primacy for devising and implementing a PSD program, consistent with the intent of the Clean Air Act. We understand that EPA should defer to the State's program, unless such program has been ruled deficient. On the basis of the State's work to date and public input process, we are of the opinion that its PSD program is appropriate and will be sufficient to retain its primacy.
2. The EPA analysis does not include an inventory of oil and gas well emissions, as was developed by the North Dakota Department of Health (DOH).
3. The EPA analysis does not include the most recent industry data submitted to the DOH in the fall of 2001 with respect to baseline emissions. The issue as to what comprises baseline emissions is one that is to be addressed as part of the Department's public hearing process.
4. EPA used 90th percentile of industry 1999-2000 emissions. It is our understanding that nothing in law or rule prescribes the 90th percentile.
5. 1999 emissions are not necessarily representative of industry's current operations. The acid rain program began in Jan of 2000. Emissions dropped 25,000 tons in year 2000. We believe year 2000 and 2001 emissions data are more representative of industry operations and should be utilized as the most current and representative emissions data for modeling analysis.

6. EPA is applying the model to the Fort Peck and Medicine Lake Wilderness areas that are well beyond 200 km from emission sources in ND. This is beyond the recommended application range of the Calpuff model. Additionally, the Fort Peck Indian reservation was re-designated to a Class I area after the permits were issued to the ND sources.
7. The EPA modeling analysis does not take into consideration the full effect of Class I variances that have been issued (i.e., Dakota Gasification Company, Little Knife Gas Company). The EPA analysis inappropriately applies emissions from these facilities toward the Class I increment.
8. It is our understanding that EPA has been advised about problems arising from the use of 1999 CEMs data because of the problems with stack flow measurements. These flow discrepancies may have caused emissions to be inaccurately over-predicted by as much as 20%.
9. The facts based on actual monitoring data indicate that air quality has been improving in the Class I areas in North Dakota. Yet, EPA uses a computer air dispersion modeling tool which projects that deterioration has taken place over the past two decades. It is our position that credence be given to actual measurements of air quality over a model trying to simulate air quality that yields results that do not comport with reality. It is also our understanding that the Calpuff model has not been formally adopted in rule.

We have enlisted the services of a professional air-modeling consultant to more fully assess the differences between EPA and the State's air quality studies and will present the results of those studies in our testimony submitted at the May 6, 2002 hearing on air quality issues in Bismarck, ND relative to our above comments.

We hope that our comments will help all parties to arrive at a common-sense solution to North Dakota's air quality management program and look forward to the possibility of discussing our concerns with you in the very near future.

Sincerely,



Richard A. Voss
Vice President-Power Development
Great Northern Power Development, L.P.

Cc: Bob Harms, ND Governor's Office
Terry O'Clair, ND DOH